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Attorney for Defendant
AMADO ESCOBEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 1:05-cr-0143 OWW
)	
<i>Plaintiff,</i>)	STIPULATION TO VACATE VIOLATION
)	HEARING AND TO SET FOR STATUS
v.)	CONFERENCE; ORDER THEREON
)	
AMADO ESCOBEDO,)	Date : April 4, 2011
)	Time: 9:00 a.m.
<i>Defendant.</i>)	Judge: Oliver W. Wanger
_____)	

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, YASIN MOHAMMAD, Assistant United States Attorney, and ERIC V. KERSTEN, Assistant Federal Defender, counsel for Defendant AMADO ESCOBEDO, that the violation hearing scheduled for March 14, 2011 may be vacated and this matter may be set for status conference on April 4, 2011, or the soonest date thereafter that is convenient to the court. **The date currently set for violation hearing is March 14, 2011 at 9:00 a.m. The requested date for status conference is April 4, 2011 at 9:00 a.m.**

Mr. Escobedo is facing a new state charge arising from the same conduct that underlies pending supervised release violation petition. The parties are attempting to reach a global agreement, but the state prosecutor is currently involved in a murder trial that is expected to last for two weeks. The parties request that the March 14, 2011 violation hearing be vacated and that the matter be set for a status conference on April 4, 2011, in either district court or in magistrate court. There is a strong possibility that

1 a negotiated settlement will be reached by that time.

2 The parties agree that the delay resulting from the continuance shall be excluded as necessary for
3 effective defense preparation pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). For this reason,
4 the ends of justice served by the granting of the requested continuance outweigh the interests of the public
5 and the defendant in a speedy trial.

6
7 BENJAMIN B. WAGNER
8 United States Attorney

9 DATED: March 10, 2011

/s/ Yasin Mohammad
YASIN MOHAMMAD
Assistant United States Attorney
Attorney for Plaintiff

12 DANIEL J. BRODERICK
13 Federal Defender

14 DATED: March 10, 2011

/s/ Eric V. Kersten
ERIC V. KERSTEN
Assistant Federal Defender
AMADO ESCOBEDO

18 **ORDER**

19 Pursuant to stipulation of the parties, the March 14, 2011 violation hearing is hereby vacated and
20 the matter is set for status conference on April 4, 2011 at 9:00 a.m. in Courtroom 3 before the undersigned
21 District Judge. Time is excluded in the interests of justice pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and
22 (B)(iv).

23
24 IT IS SO ORDERED.

25 Dated: March 11, 2011

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE